

The Law Offices of Avrum J. Rosen, PLLC
Attorneys for Debra Kramer, Plaintiff-Trustee
38 New Street
Huntington, New York 11743
(631) 423-8527
Fred S. Kantrow
Deborah L. Dobbin

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X
In re:

Chapter 7

INTERNATIONAL EXCHANGE
SERVICES, LLC,

Case No.: 13-40909-ess

Debtor.

-----X
DEBRA KRAMER, AS CHAPTER 7 TRUSTEE
FOR THE ESTATE OF INTERNATIONAL
EXCHANGE SERVICES, LLC,

Adv. Pro. No. 13-1111-ess

Plaintiff,

-against-

FUSION RENEWABLES, LLC,

Defendant.

-----X

REPLY TO COUNTERCLAIMS

Debra Kramer, as chapter 7 trustee of the estate of International Exchange Services, LLC, the plaintiff herein (the “Plaintiff”), by and through her attorneys, The Law Offices of Avrum J. Rosen, PLLC, respectfully submits this as and for her Reply to the counterclaims asserted by Fusion Renewables, LLC, the defendant (the “Defendant”), and states as follows:

1. Plaintiff denies the allegations set forth in paragraph “65” (the “First Counterclaim”).
2. Plaintiff denies the allegations set forth in paragraph “66”.

3. Plaintiff denies the allegations set forth in paragraph “67”.

WHEREFORE, the Plaintiff respectfully demands that the allegations in the First Counterclaim be dismissed, with prejudice, together with such other and further relief that this Court deems just and proper under the facts and circumstances herein.

Dated: Huntington, New York
July 30, 2013

The Law Offices of Avrum J. Rosen, PLLC
Attorneys for Debra Kramer, Trustee/Plaintiff

BY: S/Fred S. Kantrow
Fred S. Kantrow
38 New Street
Huntington, New York 11743
631 423 8527
Fkantrow@avrumrosenlaw.com
